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FILE NO.: 58587.001

April 19, 2013

Hon. Michael A. Shipp  
USDC - Trenton Vicinage  
Clarkson S. Fisher Fed Bldg & US  
Courthouse - Rm. 7000  
402 E. State Street  
Trenton, NJ 08608

Re: In Re New Jersey Tax Sales Certificates Antitrust  
Litigation  
Master Docket: 3:12-cv-01893-MAS-TJB

Dear Judge Shipp:

This law firm represents the M.D. Sass Defendants in the above-referenced litigation. We are also a member of a group of defendants who jointly filed a motion to dismiss the Amended Consolidated Complaint (Docket entry 174). In addition, several defendants filed separate motions to dismiss relating to arguments specific to their situations. Not all defendants are members of the joint defense group, and while some non-members separately joined in the Joint Defense Motion, there were several defendants who did not. Interim Counsel for the Class Plaintiffs and the Joint Defense Group have agreed to a proposed Stipulated Order relating to an extension of time to file Opposition and Replies, as well as an extension of page limits.

Under this agreement, the time by which Class Plaintiffs must file their brief in opposition is extended to May 15, 2013, and the page limitation is extended to 80 pages at 14 point Times New Roman Font to address all of the defendants' motions to dismiss except for MTAG Services, LLC, for which they may file a regular-length brief (40 pages at 14 point Times New Roman Font). The time by which all

COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.

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defendants must file their replies is extended to July 3, 2013, and the page limitation on the brief reply for the Joint Defense Motion to Dismiss is extended to 30 pages at 14 point Times New Roman Font. All other defense replies must comply with the page limitations contained in the local rules (15 pages at 14 point Times New Roman Font).

I have attached a proposed form of Stipulated Order that has been agreed upon by the Joint Defense Group and Interim Counsel for the Class Plaintiffs. If your honor finds this proposed Order acceptable, kindly execute it and ask your staff to file the executed Order on the ECF system.

Thank you for your time and consideration of our request.

Respectfully Submitted,  
COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.

By: s/William J. Hughes, Jr.  
William J. Hughes, Jr.  
Counsel for MD Sass Defendants

WJH/bl  
Enclosure  
cc: All counsel via ecf

CLAC 2084645.1